neighboring user having a lower similarity to the advisee.

REMARKS

Claims 1-14 are currently pending in the application. By the amendment claims 1 and 8 are amended for the Examiner's consideration. The above amendments do not add new matter to the application and are fully supported by the specification. For example, support for the amendment to claim 1 is provided at Figures 1-4, and at pages 10-11, 19-21 and 23-26 of the specification. Further, support for the amendment to claim 8 is provided at Figure 1-4, and at pages 10-11 and 19-20 of the specification. Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

35 U.S.C. § 102 Rejection

Claims 1-14 are rejected under 35 U.S.C. § 102(a) as being anticipated by U. S. Patent No. 6,801,909 issued to Delgado, *et al.* ("DELGADO"). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants submit that the 35 U.S.C. § 102(a) rejection is overcome because DELGADO does not disclose every element of the claimed invention based on the above amendments. In this case, claim 1 recites, in pertinent part:

> "....computing a plurality of similarity factors based on at least one advisee profile from at least one newly rated item and determining which at least one user has already rated the item, wherein the advisee profile for a recommendation system comprising a plurality of records, each record including a user identifier, an item identifier, and a rating value, such that each record is linked in a first and a second dimension..."

Claim 8 recites, in pertinent part:

> "...receiving a recommendation request comprising a selected item list from the advisee for the recommendation by a recommendation system; in response to the recommendation request, computing a plurality of similarity factors based on at least one advisee profile from at least one newly rated item and determining which at least one user has already rated the item."

Claim 7 originally recites, in pertinent part:
> "...each record including a user identifier, an item identifier, and a

rating value, wherein each record is linked in a first and a second dimension, the first dimension linking records with a same user identifier in a sequence according to the item identifier, and the second dimension linking records with a same item identifier in a sequence according to the user identifier."

The Examiner suggests that Col. 3, lines 55 to Col. 4, line 35 of DELGADO discloses all the features of independent claims 1, 7 and 8. This appears to be inaccurate because neither the cited passage nor the remainder of DELGADO's disclosure and drawings bear any relation to the elements recited in these claims. In particular, nothing in DELGADO discloses or suggests in response to the recommendation request, computing a plurality of similarity factors based on at least one advisee profile from at least one newly rated item and determining which at least one user has already rated the item. DELGADO also does not show the first and second dimensions and related features. In particular, DELGADO shows a multi-level structure permitting the addition and manipulation of categories, subcategories and sub-subcategories, enabling the system to differentiate between basic and advanced (detailed) searches. (Col. 7, lines 54-57). DELGADO fails to teach each record including a user identifier, an item identifier, and a rating value, wherein each record is linked in a first and a second dimension, as claimed in Applicant's invention.

DELGADO discloses collaborative-based filters where predictions are based on the previously captured ratings (most popular visited attributes) of similar users regarding the particular item, as well as the user's (neighboring user's) previously captured ratings regarding other items (Col. 5, lines 36-40 and Col. 9, lines 1-15). DELGADO teaches that every update of the rating value triggers a pre-computation of the similarity factors and neighboring users.

Applicants submit that the claimed invention uses the user/item profiles to store any updated rating factors. But, for generating a recommendation, pre-computed similarity factors measuring the similarity between the advisee and the multitude of the users are computed for temporary use. These similarity factors calculated per recommendation request are then associated with the corresponding users, which then are exploited to determine (per recommendation request) the neighboring users of the advisee. In the response to the recommendation request, the claimed invention computes a plurality of

similarity factors based on at least one advisee profile from at least one newly rated item and determines which user has already rated the item. DELGADO fails to teach generating a recommendation with pre-computed similarity factors measuring the similarity between the advisee and the multitude of the users that are computed for temporary use.

DELGADO also teaches event-based filtering that records query-based searches and associating a set of recorded queries with a particular user (Col. 6, lines 1-7). However, as discussed above, the claimed invention discloses computing a plurality of similarity factors based on at least one advisee profile from at least one newly rated item and determining which at least one user has already rated the item. Further, the claimed invention discloses each record including a user identifier, an item identifier, and a rating value, wherein each record is linked in a first and a second dimension. DELGADO teaches away from the claimed invention since the records all query-based searches are not "newly rated items" as claimed by the claimed invention. DELGADO also does not show the first and second dimensions and related features. In particular, DELGADO shows a record of queries submitted by a user being useful for modeling the user's interest behavior. (Col. 6, lines 7-14). DELGADO fails to teach each record including a user identifier, an item identifier, and a rating value, wherein each record is linked in a first and a second dimension, as claimed in Applicant's invention.

DELGADO teaches the mapping level database having a multi-level tree-like structure (Fig.6) which provides categories, subcategories and sub-sub categories enabling the system to differentiate between basic and advanced searches. This is contrary to the claimed invention, since nowhere in DELGADO is the response to the recommendation request, computing a plurality of similarity factors based on at least one advisee profile from at least one newly rated item and determining which at least one user has already rated the item. DELGADO also does not show the first and second dimensions and related features. Instead, DELGADO differentiates between basic and advanced searches and creates a user profile based on the user interacting with the system overtime (Col. 8,lines 12-18).

DELGADO teaches event-based filtering that uses information about the preferences that the user has visited, that is the user has expressed an interest. The user

profile in DELGADO is created by the number of times the user has selected a preference divided by the total number of searches performed by the user (Col. 8, lines 38-64). However, this process of DELGADO teaches away from the claimed invention since the user profile is developed over the number of times the user has selected a preference, not "newly rated items" as claimed by the claimed invention. Nor does DELGADO show the first and second dimensions and related features.

Because claims 1, 7 and 8 each recite at least one element not taught or disclosed by DELGADO, the 102(a) rejection of claims 1, 7 and 8 has been overcome and should be withdrawn. Accordingly, claims 1, 7 and 8 are distinguishable over DELGADO and are in condition for allowance. Claims 9-14 are allowable based on their dependencies from allowable claim 8.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants submit that all of the claims are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue. The Examiner is invited to contact the undersigned at the telephone number listed below, if needed. Applicants hereby make a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No.09-0457.

Respectfully submitted,

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April 5, 2005

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